

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
TRENK, DiPASQUALE, WEBSTER, DELLA FERA & SODONO, P.C. 347 Mt. Pleasant Avenue, Suite 300 West Orange, New Jersey 07052 (973) 243-8600 Shoshana Schiff (SS-9639) Sam Della Fera, Jr. (SD-4840) <i>Proposed Counsel to WRS, LLC, Debtor and Debtor-in-Possession</i>	
In re:	Chapter 11
WRS, LLC,	Case No. 10-28461
Debtor.	Honorable _____

Recommended Local Form:	<input checked="" type="checkbox"/> Followed	<input type="checkbox"/> Modified
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**APPLICATION FOR RETENTION OF COUNSEL
AND CERTIFICATE OF COMPLIANCE WITH D.N.J. LBR 2014-1(a)**

- The applicant, WRS, LLC (the "Debtor") is the:

<input type="checkbox"/> Trustee:	<input type="checkbox"/> Chap. 7	<input type="checkbox"/> Chap. 11	<input type="checkbox"/> Chap. 13.
<input checked="" type="checkbox"/> Debtor:	<input checked="" type="checkbox"/> Chap. 11	<input type="checkbox"/> Chap. 13	
<input type="checkbox"/> Official Committee of _____			
- The applicant seeks to retain the following professional, Trenk, DiPasquale, Webster, Della Fera & Sodono, P.C. ("Trenk DiPasquale"), to serve as:

<input checked="" type="checkbox"/> Attorney for:	<input type="checkbox"/> Trustee	<input checked="" type="checkbox"/> Debtor-in-Possession
<input type="checkbox"/> Official Committee of _____		

- ☐ Accountant for: ☐ Trustee ☐ Debtor-in-possession
- ☐ Official Committee of _____
- ☐ Other Professional:
- ☐ Realtor ☐ Appraiser ☐ Special Counsel
- ☐ Auctioneer ☐ Other (specify): _____

3. The employment of the professional is necessary because the Debtor requires legal counsel to perform the required legal services during the pendency of the case.
4. The professional has been selected because of its considerable experience in the field of bankruptcy, debtor-creditor rights, and asset liquidation. The Debtor believes that Trenk DiPasquale is well qualified to represent it as counsel in its Chapter 11 case.
5. The professional services to be rendered are as follows:
- a. advising the Debtor with respect to the power, duties and responsibilities in the continued management of its properties and financial affairs as debtor, including the rights and remedies of the Debtor-in-Possession with respect to its assets and with respect to the claims of creditors;
 - b. advising the Debtor with respect to preparing and obtaining approval of a Disclosure Statement and Plan of Reorganization;
 - c. preparing on behalf of the Debtor, as necessary applications, motions, complaints, answers, orders, reports and other pleadings and documents;
 - d. appearing before this Court and other officials and tribunals, if necessary, and protecting the interests of the Debtor in federal, state and foreign jurisdictions and administrative proceedings;
 - e. negotiating and preparing documents relating to the use, reorganization and disposition of assets, as requested by the Debtor;

- f. negotiating and formulating a Disclosure Statement and Plan of Reorganization;
 - g. advising the Debtor concerning the day-to-day operations of its business and the administration of its estate as debtor-in-possession; and
 - h. performing such other legal services for the Debtor, as may be necessary and appropriate herein.
6. The proposed arrangement for compensation is as follows:
- Compensation on an hourly basis as approved by the Court upon the filing of fee applications and as more fully set forth in the Certification of Professional in Support of Application for Retention of Professional filed simultaneously herewith.
7. To the best of the applicant's knowledge, the professional's connection with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:
- ☐ None
- ☒ Describe connection:
- John M. McDonnell, Esq., a partner in Trenk, DiPasquale, sometimes serves as a Chapter 11 and Chapter 7 Trustee in unrelated matters; Anthony Sodono, III Esq., another partner in Trenk, DiPasquale, was previously employed in the Office of the United States Trustee until or about December 31, 2006 and worked on unrelated matters.
8. To the best of the applicant's knowledge, the professional (check all that apply):
- ☒ does not hold an adverse interest to the estate.
 - ☒ does not represent an adverse interest to the estate.
 - ☒ is a disinterested person under 11 U.S.C. § 101(14).

☐ does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

☒ Other. The Debtor's business consists of construction and construction-related services. Our firm is also seeking to be retained as counsel to certain affiliates of the Debtor, to wit, WRS Holdings, LLC; WRS, LLC; Woods Restoration Services of Montclair, NJ, LLC; Woods Restoration Services of S.C., LLC; Environmental Remediation Concepts, LLC; and WRS, Inc. (collectively, the "Related Debtors"). The Debtor's Chief Executive Officer, Chet Dunican, is also the Chief Executive Officer of the Related Debtors.

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows:

Wherefore, the applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may hereafter determine and allow.

Dated: June 11, 2010

WOODS RESTORATION SERVICES, LLC

By: 
Chet Dunican, Chief Executive Officer

- and -

**TRENK, DiPASQUALE, WEBSTER,
DELLA FERA & SODONO, P.C.**

*Proposed Counsel to Woods Restoration Services, LLC,
Debtor and Debtor-in-Possession*

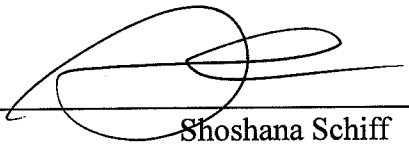
By: 
Shoshana Schiff

CERTIFICATE OF COMPLIANCE WITH D.N.J. LBR 2014-1(a)

I have complied with D.N.J. LBR 2014-1(a) by mailing a copy of this application to all the following who did not receive electronic notice from the Court: the United States Trustee, the Debtor and/or Debtor's attorney, the Trustee (as applicable), the secured creditors, the Official Committees (as applicable), and others requesting notice, all of whose addresses are shown on the attached service list, by regular mail, postage prepaid, within one (1) day after filing with the Court.

Dated: June 16, 2010

Signed: _____


Shoshana Schiff

Rev. 7/1/04; jml

SERVICE LIST

United States Trustee
One Newark Center
Suite 2100
Newark, NJ 07102

C&D Construction, LLC
121 Chestnut Street
Garfield, NJ 07026

SECURED CREDITOR:

MFC Capital Funding, Inc.
Attn: Edward J. Ryczek,
Managing Director
111 South Wacker Drive, Suite 5050
Chicago, IL 60606

Advanced Furnace and Duct Cleaning
409 Cumberland Avenue
Bayville, NJ 08721

Truly New Cleaning Corp.
196-43 53rd Avenue
Fresh Meadows, NY 11365

20 LARGEST UNSECURED CREDITORS:

Phillip Woods
10 Sunfield Lane
West Hartford, CT 06107

Home Depot
PO Box 9055
Department 32
Des Moines, IA 50368-9055

Martin Woods
32 Uplands Drive
West Hartford, CT 06107

Valor Management Corp.
200 South Michigan Avenue
Suite 1020
Chicago, IL 60604

OPS Corp.
200 S. Michigan Avenue
Suite 1020
Chicago, IL 60604

McKenna Long and Aldridge, LLP
303 Peachtree Street
Suite 5300
Atlanta, GA 30308

Charles George Companies, Inc.
PO Box 857
Londonberry, NH 03053

Automatic Suppression Alarm
67 Ramapo Valley Road
Suite 101
Mahwah, NJ 07430

William Scotsman, Inc.
PO Box 91975
Chicago, IL 60693-1975

Advanced Packing Services
521 Ellington Road
South Windsor, CT 06074

Tesser and Cohen
946 Main Street
Hackensack, NJ 07601

Professional Painting LLC
205 Earl Street
Woodbridge, NJ 07095

TCB Ventures, Inc.
136 West Central Avenue
Bergenfield, NJ 07621

Post & Kelly Electric Co., Inc.
PO Box 109
Hawthorne, NJ 07507

Horizon Blue Cross Blue Shield
PO Box 1738
Newark, NJ 07101-1738

Precise Management LLC
286 Valley Road
Wayne, NJ 07470

Johnny On The Spot, Inc.
3168 Bordentown Avenue
Old Bridge, NJ 08857